

**MARKMONITOR COMMENT ON ICANN'S DRAFT FISCAL YEAR 2019 OPERATING PLAN AND BUDGET AND FIVE YEAR OPERATING PLAN**

MarkMonitor, part of Clarivate Analytics, appreciates the opportunity to comment and offer feedback to ICANN on its draft Fiscal Year 2019 (FY19) Operating Plan and Budget.

MarkMonitor is one of the largest corporate domain name registrars and brand protection companies worldwide. In addition, MarkMonitor currently supports more than 30 global companies having nearly 70 existing .BRAND top-level domain names. More importantly, over 50 existing MarkMonitor clients have expressed interest in applying for a future .BRAND TLD in subsequent rounds in order to expand their online presence to reach, more directly, consumers, clients and business partners.

We note with concern that ICANN's FY19 Operating Plan and Budget fails to include any funding resources for the next application round of new gTLDs. Existing GNSO policy on New Generic Top-Level Domains includes explicit recognition that the "request for proposals for the first round will include scheduling information for the subsequent rounds to occur within one year." Additionally, in an ICANN Board resolution passed in 2012, the Board committed to future gTLD applications stating: "ICANN is committed to opening a second application window for the New gTLD Program as expeditiously as possible."

Despite these affirmations of commitment, ICANN's proposed budget and operational plan contains no funding for any preparatory work and expressly states that "No resources are in the FY19 budget for this implementation [preparation] work."

In 2009, more than two years prior to the launch of the first new gTLD round, ICANN budgeted more than seven million dollars to be used for additional staff, technical costs, application processing and other expenses associated with the new gTLD application round. While the GNSO is currently engaged in the policy process for determining what changes will be required for the introduction of additional new gTLDs, existing PDP workstreams anticipate that such policy work will be completed during FY 2019. If ICANN fails to start budgeting now for preparatory work, ICANN will not be able to deliver on its commitment to open, expeditiously, a second application window. ICANN cannot afford to wait until completion of all GNSO policy recommendations before beginning to budget for the preparatory work needed to open another application round.

On behalf of future new gTLD registry operators, including many dozen .BRAND applicants, we urge ICANN to amend its draft FY 19 Budget to include resources for preparatory work on the next application round.

Respectfully submitted,



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